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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**SACRAMENTO DIVISION**

|                                  |   |   |
|----------------------------------|---|---|
| NATALIA TSUBERA,                 | ) | Case No.: 2:24-cv-01789-AC                |
| Plaintiff,                       | ) | STIPULATION AND <del>PROPOSED</del> ORDER |
| vs.                              | ) | FOR AN EXTENSION OF TIME                  |
| COMMISSIONER OF SOCIAL SECURITY, | ) |   |
| Defendant.                       | ) |   |

Pending the Court's approval, the parties hereby stipulate that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended twenty-eight (28) days from November 18, 2024, up to and including December 16, 2024.

This is Defendant's first request for an extension, and it is made with good cause. This case was recently reassigned to undersigned counsel for Defendant, along with two other briefs, all of which are due in mid to late-November 2024. Moreover, counsel already has five other briefs due by early December and has preplanned leave for one week in late November. Thus,

Defendant requires an extension in this case, and may require extensions in other cases, and requests this extension in good faith and with no intent to delay these proceedings unnecessarily.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: October 29, 2024

/s/ Jesse S. Kaplan\*

(\*as authorized via e-mail on October 29, 2024)

JESSE S. KAPLAN

Attorney for Plaintiff

Dated: October 29, 2024

PHILLIP A. TALBERT

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MATHEW W. PILE

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By: /s/ Mary Tsai

MARY TSAI

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Office of Program Litigation, Office 7

Attorneys for Defendant

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including December 16, 2024, to respond to Plaintiff's Motion for Summary Judgment.

DATED: October 30, 2024



ALLISON CLAIRE

UNITED STATES MAGISTRATE JUDGE